

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25 cr 76 TPB-AAS

DMITRY SHUSHLEBIN,
a/k/a "Weston Dyer,"
a/k/a "Ilia Bzhelichenko,"
a/k/a "Ilya Yazikov," and
SANJAR JAMILOV,
a/k/a "Jerry Braun"

18 U.S.C. § 371
(Conspiracy)

52 U.S.C. § 10307(c)
(Giving false information
in registering to vote)

52 U.S.C. § 20511(2)(A)
(Submission of fraudulent
voter registrations)

18 U.S.C. § 1001
(False Statements)

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy)

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FILED - USDC - FLMD - TPA

A. Introduction

At times material to this Indictment:

1. The Pinellas County Supervisor of Elections was responsible for conducting voter registration for state, federal, and local elections and for administering all elections in Pinellas County, Florida.

2. DMITRY SHUSHLEBIN was a citizen of Russia residing in the United States.

3. SANJAR JAMILOV was a citizen of Uzbekistan residing in the United States.

4. SHUSHLEBIN, JAMILOV, and others submitted 132 false and fraudulent voter registration applications, in the names of other individuals, to the Pinellas County Supervisor of Elections, in the Middle District of Florida, in February and March 2023. These 132 applications were submitted in envelopes with identically formatted return and address labels. The address label used on every envelope contained the same typographical error. The applications themselves were similar in the following ways:

- a. None of the applicants have middle names;
- b. None of the applicants list a Florida driver's license or State ID number;
- c. The date next to the signature line on many applications follows the same pattern:
 - i. periods are used to separate the day, month and year, for example "02.17.23";
 - ii. a zero is used before any single digit; and
 - iii. only the last two digits of the year are used;
- d. nearly all the addresses appear twice within the 132 applications;
- e. the same date of birth appears on multiple applications;
- f. the last four digits of the purported social security numbers used are nearly sequential in many instances; and

g. there are notable similarities in the signatures including, among others, a line drawn under a signature, a circle drawn around others or, in place of a signature in script, a printed signature following the pattern of the first letter of the applicant's purported first name followed by their last name.

5. Change of address forms were submitted to the United States Postal Service for approximately 129 of the 132 applications. These change of address forms redirected mail for the applicants on the voter registration forms to (1) a mailbox controlled by SHUSHLEBIN in someone else's name; (2) an apartment where JAMILOV lived; and (3) a commercial property that SHUSHLEBIN had rented using an alias.

6. The Pinellas County Supervisor of Elections determined that the applications were false and fraudulent, and rejected each application.

B. The Conspiracy

7. Beginning on an unknown date, but at least as early as in or around November of 2022, and continuing until April of 2023, in the Middle District of Florida, and elsewhere, the defendants,

DMITRY SHUSHLEBIN,
a/k/a "Weston Dyer,"
a/k/a "Ilia Bzhelichenko,"
a/k/a "Ilya Yazikov," and
SANJAR JAMILOV,
a/k/a "Jerry Braun,"

did knowingly and willfully combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is:

- (a) to knowingly and willfully give false information as to their names and addresses for the purpose of establishing their eligibility to register to vote, in violation of 52 U.S.C. § 10307(c); and
- (b) in any election for federal office, to knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of Florida of a fair and impartially conducted election process, by the procurement and submission of voter registration applications that they knew to be false, fictitious, and fraudulent under the laws of the State of Florida, in violation of 52 U.S.C. § 20511(2)(A).

C. Manner and Means

8. The manner and means by which the co-conspirators sought to accomplish the objects of the conspiracy included, among others:

- a. It was a part of the conspiracy that the co-conspirators would and did submit false and fraudulent voter registration applications in names that were not their own to the Pinellas County Supervisor of Elections;
- b. It was further part of the conspiracy that co-conspirators would and did submit Mail Forwarding Change of Address forms to the United States Postal Service redirecting mail addressed to the individuals on the fraudulent voter registration applications to one of three locations controlled by the co-conspirators,

so that the co-conspirators could intercept any mail related to the false and fraudulent voter registration applications;

c. It was further part of the conspiracy that co-conspirators would and did rent mailboxes and other premises controlled by the co-conspirators for the purpose of receiving mail relating to the fraudulent voter registration applications;

d. It was further part of the conspiracy that SHUSHLEBIN would and did pay JAMILOV for work in furtherance of the conspiracy;

e. It was further part of the conspiracy that co-conspirators would and did employ various techniques to protect their anonymity and to thwart detection of their activities by government and law-enforcement agencies; and

f. It was further part of the conspiracy that co-conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

E. Overt Acts

9. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

a. On or about November 1, 2022, SHUSHLEBIN, using the name “Weston Dyer,” signed a lease for a business premises located on Logan Street in Clearwater, Florida (the “Logan Street Address”). Mail related to the false and

fraudulent voter applications submitted by the co-conspirators was re-directed to this address.

b. On or about February 3, 2023, SHUSHLEBIN used a bank account in the name of “Ilya Yazikov” to send a payment of \$1,000 to JAMILOV.

c. In or around February 2023, JAMILOV told his roommate that change of address confirmation notices that had been received at their apartment in the names of the below individuals were intended for JAMILOV and his then-girlfriend, and that JAMILOV was expecting to receive more:

- i. Louis Allen
- ii. Albert Ballard
- iii. Samuel Bowman
- iv. Terry Bradley
- v. Anthony Brooks
- vi. Michael Burke
- vii. David Foster
- viii. Jayden Galloway
- ix. Dennis Gould
- x. Kenneth Miller
- xi. Jasper Novak
- xii. Michael Nunez
- xiii. Harry Price
- xiv. Carmen Rhoads
- xv. Harold Roberts
- xvi. Grant Sanchez
- xvii. Scott Neal
- xviii. Alexander Scott
- xix. Andrew Skinner
- xx. Darren Smith
- xxi. Chad Stewart
- xxii. Daniel Wyatt

Fraudulent voter registration applications were subsequently submitted to the

Pinellas County Supervisor of Elections in each of these names.

d. On or about February 14, 2023, JAMILOV submitted or caused to be submitted a fraudulent voter registration application to the Pinellas County Supervisor of Elections in the name of “Ethan Cunningham.”

e. On or about February 14, 2023, JAMILOV submitted or caused to be submitted a fraudulent voter registration application to the Pinellas County Supervisor of Elections in the name of “Michael Craig.”

f. On or about February 17, 2023, JAMILOV submitted or caused to be submitted a fraudulent voter registration application to the Pinellas County Supervisor of Elections in the name of “Ariel Elston.”

g. On or about February 17, 2023, SHUSHLEBIN used a bank account in the name of “Ilya Yazikov” to send a payment of \$1,000 to JAMILOV.

h. On or about February 18, 2023, JAMILOV submitted or caused to be submitted a fraudulent voter registration application to the Pinellas County Supervisor of Elections in the name of “Norberto Sasser.”

i. On or about March 3, 2023, SHUSHLEBIN sent an email to an owner of a mailbox store in Fort Myers, Florida, instructing that individual to send mail from the Pinellas County Supervisor of Elections addressed to the following individuals to the Logan Street Address:

- i. Ethan Cunningham
- ii. Seth Archer
- iii. Raphael Emery
- iv. Samuel Hickman
- v. Michael Craig; and

vi. Scott Neal.

j. On or about March 6, 2023, JAMILOV ^{caused} ~~submitted~~ a fraudulent voter registration application to be submitted to the Pinellas County Supervisor of Elections in the name of "Lily Wall."

D.J.M.

k. On or about March 7, 2023, SHUSHLEBIN, posing as "Foster Haugen," one of the names on the fraudulent voter applications, called the Pinellas County Supervisor of Elections to inquire about registering to vote without a valid Florida driver's license or ID card. While he claimed to be Foster Haugen, the caller ID for the number SHUSHLEBIN used said "Weston Dyer," the same alias he used to lease the Logan Street Address and a name that had been used on another one of the fraudulent voter registration applications in the 132 applications received by the Pinellas County Supervisor of Elections.

l. On or about April 28, 2023, SHUSHLEBIN used a fake California driver's license in the name of "Ilia Bzhelichenko" to rent a mailbox in West Palm Beach, Florida. Ilia Bzhelichenko was a name that was used on one of the fraudulent voter registration applications in the 132 applications received by the Pinellas County Supervisor of Elections.

All in violation of 18 U.S.C. § 371.

COUNTS TWO AND THREE

(Giving False Information in Registering to Vote)

1. The allegations set forth in paragraphs 1 through 6 of Count One of this Indictment are realleged and incorporated by reference herein.

2. On or about February 14, 2023, in the Middle District of Florida, and elsewhere, the defendants,

DMITRY SHUSHLEBIN,
a/k/a “Weston Dyer,”
a/k/a “Ilia Bzhelichenko,”
a/k/a “Ilya Yazikov,” and
SANJAR JAMILOV,
a/k/a “Jerry Braun,”

aided and abetted by each other and other persons, unknown to the Grand Jury, did knowingly and willfully give false information as to their names and addresses for the purpose of establishing their eligibility to register and vote:

Count	False Voter Application
2	Voter registration in the name of “Ethan Cunningham”
3	Voter registration in the name of “Michael Craig”

In violation of 52 U.S.C. § 10307(c) and 18 U.S.C. § 2.

COUNTS FOUR AND FIVE

(Submission of Fraudulent Voter Registrations)

1. The allegations set forth in paragraphs 1 through 6 of Count One of this Indictment are realleged and incorporated by reference herein.

2. On or about February 14, 2023, in the Middle District of Florida, and elsewhere, the defendants,

DMITRY SHUSHLEBIN,
a/k/a “Weston Dyer,”
a/k/a “Ilia Bzhelichenko,”
a/k/a “Ilya Yazikov,” and
SANJAR JAMILOV,
a/k/a “Jerry Braun,”

aided and abetted by each other and other persons, unknown to the Grand Jury, in any election for federal office, did knowingly and willfully attempt to deprive and defraud the residents of the State of Florida of a fair and impartially conducted election process, by the procurement and submission of voter registration applications that they knew to be false, fictitious, and fraudulent under the laws of the State of Florida:

Count	False Voter Application
4	Voter registration in the name of “Ethan Cunningham”
5	Voter registration in the name of “Michael Craig”

In violation of 52 U.S.C. § 20511(2)(A) and 18 U.S.C. § 2.

COUNT SIX AND SEVEN
(False Statements)

1. The allegations set forth in paragraphs 1 through 6 of Count One of this Indictment are realleged and incorporated by reference herein.

2. On or about the date specified in each count below, in the Middle District of Florida, and elsewhere, the defendant,

DMITRY SHUSHLEBIN,
a/k/a “Weston Dyer,”
a/k/a “Ilia Bzhelichenko,”
a/k/a “Ilya Yazikov,”

did knowingly and willfully make any materially false, fictitious, or fraudulent statement or representation in a matter within the jurisdiction of the executive branch of the Government of the United States as specified in each count below:

Count	Date	False Statement
6	January 9, 2022	Falsely claimed to be “Ilia Bzhelichenko” in United States Postal Service form titled, “Application for Delivery of Mail Through Agent”
7	February 12, 2022	Falsely claimed to be “Ilya Yazikov” in United States Postal Service form titled, “Application for Delivery of Mail Through Agent”

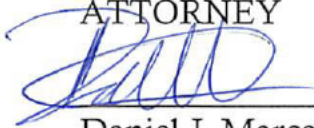
In violation of 18 U.S.C. § 1001(a)(2).

A TRUE BILL,



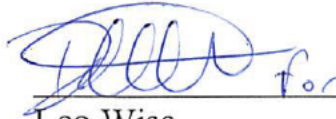
Foreperson

SARA SWEENEY
ACTING UNITED STATES
ATTORNEY

A blue ink signature of Daniel J. Marcet.

Daniel J. Marcet
Assistant United States Attorney
Chief, National Security Section

ANTOINETTE T. BACON
SUPERVISORY OFFICIAL

A blue ink signature of Leo Wise, followed by the word "for" in cursive.

Leo Wise
Trial Attorney
Public Integrity Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

DMITRY SHUSHLEBIN, a/k/a "Weston Dyer," a/k/a "Ilia Bzhelichenko," a/k/a "Ilya Yazikov," and
SANJAR JAMILOV, a/k/a "Jerry Braun"

INDICTMENT

Violations: 18 U.S.C. § 371; 52 U.S.C. § 10307(c);
52 U.S.C. § 20511(2)(A); 18 U.S.C. § 1001

A true bill,



Foreperson

Filed in open court this 18th day

of February 2025.



KARINA NIEVES

Clerk

Bail \$ _____
